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**From:** Mitchell Martin [mmartin@greenleaf-power.com]  
**Sent:** 8/20/2020 10:55:44 PM  
**To:** Connolly, Scott [Connolly.Scott@epa.gov]  
**CC:** Chew, Andrew [Chew.Andrew@epa.gov]; Kdudash@aqmd.gov; Jim Robertson [jrobertson@desertviewpower.com]; Mark Boucher [mboucher@plainfieldre.com]  
**Subject:** RE: Permission to waive 60 day notification for Compliance Performance re-test-Desert View Power Permit # CB-OP 99-01  
**Attachments:** EPA - 30-day Extension request for Boiler MACT HCl compliance testing 2020-08-20.pdf

Mr. Connolly,

Thank you for taking my call earlier. As discussed by phone and in the attached letter, Desert View Power has encountered what we believe to be an equipment malfunction related to our hydrated lime injection feeders. Desert View is requesting a 30 day extension to correct the malfunction and re-perform the test to demonstrate HCl compliance.

Desert View Power will continue to comply with its SO<sub>2</sub> surrogate operating limit for acid gas control during this time.

Should you have any questions, please contact me at the information below. We will continue to keep you apprised of developments in the process as we work towards a successful test.



**Mitchell Martin, PE**  
Operations & Engineering Director  
Greenleaf Power, LLC

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**From:** Connolly, Scott <Connolly.Scott@epa.gov>  
**Sent:** Friday, August 07, 2020 4:50 PM  
**To:** Mitchell Martin <mmartin@greenleaf-power.com>  
**Cc:** Jim Robertson <jrobertson@desertviewpower.com>; Chew, Andrew <Chew.Andrew@epa.gov>  
**Subject:** RE: Permission to waive 60 day notification for Compliance Performance re-test-Desert View Power Permit # CB-OP 99-01

Hello Mr. Martin,

During our call with Ms. Gavaldon, Mr. Chew and I advised Greenleaf Power to proceed with the scheduling of the compliance re-test and that it was preferable to schedule the test sooner, rather than delay to comply with the 60 day notification.

We have received your intent to test on August 17-19 using the same Method 26 testing procedures, and will look forward to receiving the results of the testing when the test report is completed.

If you have future questions, please let me know.

Best,

**Scott Connolly**, Environmental Engineer

Enforcement and Compliance Assurance Division – Air Section  
US Environmental Protection Agency, Region 9  
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United States Environmental Protection Agency

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**From:** Mitchell Martin <[mmartin@greenleaf-power.com](mailto:mmartin@greenleaf-power.com)>  
**Sent:** Friday, August 7, 2020 1:26 PM  
**To:** Chew, Andrew <[Chew.Andrew@epa.gov](mailto:Chew.Andrew@epa.gov)>; Connolly, Scott <[Connolly.Scott@epa.gov](mailto:Connolly.Scott@epa.gov)>  
**Cc:** Jim Robertson <[jrobertson@desertviewpower.com](mailto:jrobertson@desertviewpower.com)>  
**Subject:** RE: Permission to waive 60 day notification for Compliance Performance re-test-Desert View Power Permit # CB-OP 99-01

Good afternoon,

Jennie Gavaldon is no longer with Greenleaf Power. I will be taking over her responsibilities for the time being.

In reviewing her emails, I saw the note below and was wondering if you have had a chance to review Desert View Power's request to re-test for HCl emissions on August 17-19 using the same Method 26 as approved for our May compliance test. Jennie mentioned that we received approval by phone, but I am hoping to confirm via email. This will be a waiver of the 30-day notice provided.

Thank you for your help. I can be reached at the contact info below for any questions.



**Mitchell Martin, PE**  
Operations & Engineering Director  
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**From:** Jennifer Gavaldon  
**Sent:** Wednesday, August 05, 2020 3:21 PM  
**To:** Chew, Andrew <[Chew.Andrew@epa.gov](mailto:Chew.Andrew@epa.gov)>; Connolly, Scott <[Connolly.Scott@epa.gov](mailto:Connolly.Scott@epa.gov)>  
**Subject:** RE: Permission to waive 60 day notification for Compliance Performance re-test-Desert View Power Permit # CB-OP 99-01

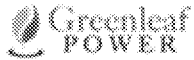
Good Afternoon,

I have my contractor tentatively scheduled for August 17-19 to conduct the Performance Re-test. I'm not sure if you were able to review my email below. Are you both in agreement with the waiver we discussed that is in the email below?

Thank you for your help,

**Jennie Gavaldon**  
**Corporate EH&S Manager**  
2600 Capital Avenue, Suite 430  
Sacramento Ca, 95816

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**From:** Jennifer Gavaldon  
**Sent:** Monday, August 3, 2020 1:50 PM  
**To:** Chew, Andrew <[Chew.Andrew@epa.gov](mailto:Chew.Andrew@epa.gov)>; Connolly, Scott <[Connolly.Scott@epa.gov](mailto:Connolly.Scott@epa.gov)>  
**Subject:** Permission to waive 60 day notification for Compliance Performance re-test-Desert View Power Permit # CB-OP 99-01

Good Afternoon Gentlemen,

On July 14, 2020, during a scheduled phone meeting, we discussed the possibility of an excess of HCl that may have occurred during our Annual Performance Testing. The final results did exceed our limits. Our 48 hr. notification and letter of root cause were sent to the EPA, via email, on July 24, 2020 and July 31, 2020. On our call, we discussed to waive the 60 day notification for the pre-test. This was due to 3<sup>rd</sup> contractor scheduling limitations, and to prove compliance with the HCl limits at an earlier date. Our contractor has an opening on August 17-19. This email is to confirm that since we are conducting the same test (26a) as in the original test plan protocol, and contractor schedule limitations, that you will waive the 60 day notification. Is this agreeable?

Respectfully,

**Jennie Gavaldon**  
**Corporate EH&S Manager**  
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